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FEDERAL MARITIME COMMISSION



October 02, 2003

Honorable Bryant L. Van Brakle
Secretary
Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, D.C. 20573

RE. Petition of National Customs Brokers and Forwarders Association of America, Inc for a Limited Exemption From Certain Tariff Requirements of the Shipping Act of 1984

Petition No **P5-03**

Dear Secretary Van Brakle:

I am Bjoern Pelzer, Regional Manager of Transworld Shipping (USA) Inc


Transworld Shipping (USA) Inc. is a NVOCC, OTI# 10423n, with one office in the United States and no overseas offices.

Please see a general overview of our FMC filing outline listed below:

- 1) The annual cost of to our tariff publishing service is estimated at \$720.00 per year. We also have filing cost per page for filing **involved** as well.
- 2) On average our office spends at least 50-60 hours per month to maintain our FMC Filing.
- 3) We are able to track the number of companies who access our company. As to date - no inquiries have been made.
- 4) We have an estimated 5% cost involved **in FMC Filing**.
- 5) Our negotiation process is 35% to 45% which are separately negotiated with shippers. This is an ongoing process which is determined by market levels and **competition**.
- 6) Tariff rates are not useful for our company because our customers do not check our tariff. Most of the time our customers do not have the time to check the tariff The rates and services are negotiated and then put in place accordingly We in turn are flexible with our customers due to the ever changing market conditions and rate levels It is very time consuming to update rates and to add rates Not to mention the cost involved in the process. The exemption of FMC filing will allow us to service the account better and to also make us more competitive -since we will not have the extra cost of filing rates

1. Bjoern Pelzer declare under penalty that the foregoing is true and correct Further I certify that I am qualified and authorized to file this verified statement.

Executed on October 2, 2003


Bjoern Pelzer
Regional Manager

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